



March 9, 2018

Project No. 8128.02.02

Dana Bayuk

Oregon Department of Environmental Quality

Northwest Region

700 NE Multnomah Street, Suite 600

Portland, Oregon 97232

Re: 2000 Joint Order Monthly Progress Report—February 2018

Siltronic Corporation

7200 NW Front Avenue, Portland, OR

Order No. ECVC-NWR-00-27

Dear Dana:

The Order Requiring Remedial Investigation and Source Control Measures, Oregon Department of Environmental Quality (DEQ) No. ECVC-NWR-00-27, issued by DEQ to Siltronic Corporation (Siltronic) and NW Natural (NWN) on October 4, 2000 (the 2000 Joint Order), requires submittal of monthly progress reports. This progress report encompasses the reporting period spanning February 1, 2018, through February 28, 2018. The next progress report is due April 15, 2018.

Because the 2000 Joint Order and the 2016 Unilateral Order (No. OPSR-NWR-16-02, issued to Siltronic on August 16, 2016 [2016 UAO]) have overlapping requirements on the Siltronic Operable Unit (SOU), Siltronic has previously sought to confirm that the Stormwater Source Control Evaluation (SSCE)¹ work on the SOU met the needs of both the 2000 Joint Order and the 2016 UAO. In a letter dated February 15, 2017, DEQ requested that Siltronic compile all SSCE work into a single work plan. As such, future work related to the SSCE will be provided in this monthly progress report related to the 2000 Joint Order. In doing so, unless DEQ instructs otherwise, Siltronic will proceed under the notion that this reporting regime will concurrently satisfy any overlapping requirements shared between the 2000 Joint Order and the 2016 UAO concerning activities undertaken on the SOU, while also meeting DEQ's request that the SSCE work be conducted under a single work plan. Therefore, the 2000 Order monthly progress reports will include the SSCE efforts, and those activities related to the Gasco Operable Unit—Allen property.

¹ In a letter dated May 23, 2017, provided by DEQ in response to Siltronic's submittal of its Revised Source Control Evaluation Work Plan, DEQ requested that "future related submittals appropriately reference stormwater source control only." Siltronic is happy to oblige and will hereafter refer to this work as Stormwater Source Control Evaluation (SSCE).

ACTIONS TAKEN UNDER THE 2000 JOINT ORDER SINCE THE PREVIOUS PROGRESS REPORT

Communications and Submittals

On February 1, DEQ responded to a January 31 e-mail from Maul Foster & Alongi, Inc. (MFA) regarding a proposed sampling approach for Siltronic Area C, stating that they did not approve of said proposed sampling approach for Area C, and reiterating their requirement that Siltronic submit a Source Control Measures Implementation and Effectiveness Monitoring Plan.

On February 12, MFA submitted a monthly progress report to DEQ for work performed by MFA on behalf of Siltronic in January 2018 pursuant to the 2000 Joint Order.

Fieldwork

On February 1 and 5, MFA downloaded data from groundwater transducers installed in selected monitoring wells.

On February 6, MFA conducted bimonthly thickness measurements of Portland Gas & Coke (PG&C) waste dense nonaqueous-phase liquid (DNAPL) in WS-15-85, WS-33-81, and WS-43-36.

On February 6, MFA collected bimonthly combustible-gas measurements.

On February 7 and 8, MFA conducted bimonthly monitoring of Siltronic groundwater wells.

On February 13, MFA collected bimonthly soil vapor samples.

During February, Siltronic provided access, as necessary, to representatives of NWN for work associated with the NWN source control measures.

ACTIONS TO BE TAKEN IN THE NEXT TWO MONTHS

Communications and Submittals

Siltronic will submit to DEQ a Source Control Measures Evaluation and Groundwater Intrusion Sampling Plan to be prepared on its behalf by MFA by March 12, 2018.

Siltronic will submit to DEQ a Stormwater Source Control Evaluation Report prepared on its behalf by MFA by March 31, 2018.

Fieldwork

March field activities will include DEQ-required quarterly groundwater performance monitoring.

April field activities will include DEQ-required bimonthly PG&C waste DNAPL liquid thickness measurements at selected wells (WS-15-85, WS-33-81, and WS-43-36); groundwater performance monitoring; bimonthly combustible-gas measurements; and bimonthly and semiannual vapor sampling.

If suitable storm events occur during the next two months, MFA will conduct a minimum of two sampling events at catch basin CB-67 in accordance with the DEQ-approved January 23, 2018, work plan for sampling stormwater influent to catch basin CB-67.

TEST RESULTS AND DATA RECEIVED

The attached Microsoft® (MS) Excel® data file contains performance and quarterly groundwater monitoring data, as well as the soil vapor data received through the end of the reporting period.

PROBLEMS EXPERIENCED OR RESOLVED

No problems were experienced during the reporting period.

Please call Michael Murray at (971) 544-2139 if you have any questions or comments regarding the contents of this progress report.

Sincerely,

Maul Foster & Alongi, Inc.



Michael R. Murray, RG, EIT
Senior Hydrogeologist



Courtney Savoie, RG
Project Geologist

Attachment: MS Excel file (as attachment to the e-mail and on CD with the hard copy)

cc w/att: Myron Burr, Siltronic
Ilene M. Munk, Foley & Mansfield
David Rabbino, Jordan Ramis
Keith Johnson, DEQ
Paul Siedel, DEQ

Henning Larsen, DEQ
Matt McClincy, DEQ
Eva DeMaria, USEPA
Sean Sheldrake, USEPA
Rene Fuentes, USEPA
Lance Peterson, CDM
Bob Wyatt, NWN
Patty Dost, Pearl Legal Group LLC
John Edwards, Anchor QEA LLC
John Verduin, Anchor QEA LLC
Carl Stivers, Anchor QEA LLC
Ben Hung, Anchor QEA LLC
John Renda, Anchor QEA LLC
Jen Mott, Anchor QEA LLC
Halah Voges, Anchor QEA LLC
Taku Fuji, Anchor QEA LLC
Rob Ede, Hahn and Associates, Inc.

ATTACHMENT

MS EXCEL FILE

